



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

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April 26, 2017

By ECF, Email and Federal Express

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017 and April 12, 2017. The government again requests reciprocal discovery from the defendants.

Contained on the enclosed compact disc are electronic copies of the following audio recordings, which the government obtained from the Securities and Exchange Commission

Defense Counsel

April 26, 2017

Page 2

(the “SEC”). These recordings were produced to the SEC by Platinum Partners (“Platinum”), contain statements of the defendants Mark Nordlicht and Uri Landesman, and are generally described below:

- Audio recording of a Platinum investor conference call on or about June 14, 2016 (“6-14-2016.mpg”): EDNY-PP-SEC-000000001;
- Audio recording of a Platinum investor conference call on or about June 28, 2016 (“6-28-2016.mpg”): EDNY-PP-SEC-000000002;
- Audio recording of the First Quarter 2016 PPVA investor conference call, on or about April 29, 2016 (“2016Q1PPVA.V1.mp3”): EDNY-PP-SEC-000000003;
- Audio recording of the First Quarter 2016 PPCO investor conference call, on or about April 29, 2016 (“2016Q1PPCO.mp3”): EDNY-PP-SEC-000000004;
- Audio recording of a PPCO investor conference call regarding a gold mine investment, in or about 2016 (“2016 PPCO Gold.mp3”): EDNY-PP-SEC-000000005;
- Audio recording of the 2015 year-end PPCO investor conference call, on or about February 1, 2016 (“2015 Year End PPCO.mp3”): EDNY-PP-SEC-000000006;
- Audio recording of the 2015 year-end PPVA investor conference call, on or about February 1, 2016 (“2015 Year End PPVA.mp3”): EDNY-PP-SEC-000000007;
- Audio recording of a PPVA investor conference call regarding the “side pocket,” on or about November 23, 2015 (“2015 PPVA Side Pocket.mp3”): EDNY-PP-SEC-000000008;
- Audio recording of the Second Quarter 2015 Platinum investor conference call, on or about July 7, 2015 (“2015Q2.mp3”): EDNY-PP-SEC-000000009;
- Audio recording of the Third Quarter 2015 Platinum investor conference call, on or about October 21, 2015 (“2015Q3.mp3”): EDNY-PP-SEC-000000010;
- Audio recording of the First Quarter 2015 Platinum investor conference call, on or about March 31, 2015 (“2015Q1.mp3”): EDNY-PP-SEC-000000011; and

Defense Counsel
April 26, 2017
Page 3

- Audio recording of the Fourth Quarter 2014 Platinum investor conference call, on or about January 14, 2015 ("2014Q4.mp3"): EDNY-PP-SEC-000000012.

Very truly yours,

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By: /s/
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cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)